

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

In Re:  
RONALD AYRES )  
VIVIAN AYRES )      Chapter 13 Proceedings  
                  )  
Debtor(s)        )      Case Number: 14-20695 KL  
                  )  
                  )

**MOTION TO MODIFY PLAN, POST-CONFIRMATION**

Comes now Paul R. Chael, Standing Chapter 13 Trustee herein, and moves the Court for an order modifying Debtor's Chapter 13 Plan, post-confirmation, increasing the Plan payment to \$1,736.00 per month and increasing the Base to \$107,060.00, and in support thereof, states as follows:

1. Debtor's Plan was filed on March 13, 2014, and was confirmed on July 31, 2014.
2. Trustee has performed an audit of this case, reviewing the claims provided for in the Plan, the claims filed, the amount of Debtor(s) current Plan payment and the length remaining on the Plan.
3. Pursuant to Trustee's review and calculations, Trustee determined the increase in the Plan payment and in the Base is necessary due to the Ocwen mortgage arrearage and the claim of Springleaf being filed higher than the Plan provided, and so the Plan will complete within 60 months of confirmation.

**Wherefore**, Trustee prays that Debtors Chapter 13 Plan be modified increasing the Plan payment to \$1,736.00 per month and increasing the Base to \$107.060.00, and for all other appropriate relief.

/s/ Paul R. Chael  
Paul R. Chael, Trustee  
Indiana Attorney No. 3881-45

**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2015 service of a true and complete copy of the above and foregoing pleading or paper is being made through the Court's ECF system upon the following:

U.S. Trustee- ustpregion10.soeccf@usdoj.gov.com  
Miguel Martinez – mmartinez@mm-bklaw.com

and upon the following by depositing the same in the United States mail, envelopes properly addressed to each of them and with sufficient first-class postage affixed.

Debtor(s) Ronald and Vivian Ayres, 6430 Valleyview Court, Portage, IN 46368

/s/ Charlene A. Hardel  
Legal Assistant to Paul R. Chael, Chapter 13 Trustee  
401 West 84th Drive, Ste. C  
Merrillville, IN 46410